

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RUSSELL BRAMMER,

Plaintiff,

v.

VIOLENT HUES PRODUCTIONS, LLC,

Defendant.

Civil Action No.: 1:17-cv-01009-CMH-IDD

**DECLARATION OF PAUL J. WEEKS IN SUPPORT OF
VIOLENT HUES PRODUCTIONS, LLC MOTION FOR SUMMARY JUDGMENT**

I, Paul J. Weeks declare:

1. I am over 21 years of age and otherwise competent to make this declaration. I am a member of the bar of the Court and counsel of record for Defendant.


2. I attest that the exhibits attached hereto and listed below are true and accurate copies of:

Ex.	Date	Description
1	11/19/2011	DX-1: Adams Morgan at Night, flickr
2	3/12/2018	DX-26: Plaintiff's Supplemental Response to Defendant Violent Hues Productions, LLC's First and Second Set of Interrogatories
3	12/10/2012	DX-2: December 10, 2012 flickr uploads to rbrammer
4	4/4/2018	Russell Brammer deposition
5	7/13/2017	DX-22: Email chain Pixsy Resolution Team and R. Brammer re Submission Update: Lawsuit Recommended (001-021539)
6	3/12/2018	DX-6: Plaintiff's Response to Defendant Violent Hues Productions, LLC's First and Second Set of Interrogatories
7	5/3/2018	Affidavit of Fernando A. Mico
8	3/30/2018	Violent Hues Productions, LLC's Responses to Plaintiff's First Set of Interrogatories
9	11/17/2016	PX-2: Screen capture of www.novafilmfest.com/plan-your-visit
10	2/7/2017	DX-21: Letter D. Deal to Violent Hues Productions, F. Mico re Infringement of photographic Copyright by Violent Hues Productions
11	4/7/2018	PX-3: Russell Brammer invoice to Bernstein management

Ex.	Date	Description
12	4/4/2016	DX-10: Email chain R. Brammer and S. Haas re copyright

3. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 4th day of May, 2017



Paul J. Weeks

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2018, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Paul J. Weeks

Paul J. Weeks (VA Bar No.: 89656)

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